

The Honorable Christopher M Alston
Hearing: April 24, 2020

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

Jack Carlton Cramer, Jr.,
Debtor

Case No. 18-13383-CMA

Chapter: 7

SECOND SUPPLEMENTAL
DECLARATION IN SUPPORT OF
DEBTOR'S OPPOSITION TO
TRUSTEE'S MOTION TO SELL FREE
AND CLEAR OF LIENS

I, Christina L Henry declare as follows:

1. I am the bankruptcy attorney for Jack Cramer, Jr, the Chapter 7 debtor in this bankruptcy case and I have personal knowledge of the information in this declaration.

2. Since filing Debtor's initial opposition to the motion to sell, I have tried to confirm that Mr. Cramer is in an installment plan with the IRS to no avail.

3. I instructed Mr. Cramer to call the IRS and then to re-send the installment agreement with postal tracking information to confirm receipt, but he was still unable to confirm that an installment plan was in place.

SECOND SUPPLEMENTAL DECLARATION OF
CHRISTINA L HENRY - 1

HENRY & DEGRAAFF, P.S.
787 MAYNARD AVE S
SEATTLE, WASHINGTON 98104
telephone (206) 330-0595
fax (206) 400-7609

1 4. Finally, in an attempt to find out whether the IRS had indeed received and
2 processed the installment request, I reached out to James Stevens, the local IRS Insolvency
3 specialist who filed the proofs of claim in this case for the IRS. After some research, Mr.
4 Stevens was able to confirm that Mr. Cramer has done everything within his power to obtain
5 an installment agreement. The letter I received today via fax confirms this. A true and
6 correct copy of the IRS fax is attached here as Exhibit 1.

7 I DECLARE UNDER THE PENALTY OF PERJURY OF THE LAWS OF THE STATE OF
8 WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF
9 MY KNOWLEDGE

10 Executed this 23rd day of April; 2020 at Bothell, WA.

11 /s/ Christina L Henry
12 Christina L Henry, WSBA# 31273

13 SECOND SUPPLEMENTAL DECLARATION OF
14 CHRISTINA L HENRY - 2

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